

State Longitudinal Data System

General Data Governance

Purpose

The SLDS is a dynamic data system that is adapting to a changing environment of data needs. This document establishes general guidelines for State Longitudinal Data System (SLDS) data governance. The guidance needs to be rigid enough to maintain logical order and control of data, but still flexible enough to adapt as the SLDS grows.

The SLDS contains data on ND schools and districts, including individual student and staff records. The SLDS will be used for the purpose of providing data needed for supporting data-driven, decision making and to facilitate state and federal reporting, including data required for the federal *No Child Left Behind Act*.

Each agency or program area is governed by specific federal and state regulations. Therefore, each agency or program area should establish more specific data governance as needed.

Overview of Data Governance

Data Governance is a system of decision rights and accountabilities for information-related processes, executed according to agreed-upon models which describe who can take what actions with what information, and when, under what circumstances, and using what methods. It has a three-part mission: to create rules, resolve conflicts, and provide ongoing services.

Proper data governance is an ongoing process. It involves evaluation of not only the collected data elements, but also the methods of collection, storage, usage, and eventual output of the data. The goal of data governance is to continually produce high quality data while lowering cost and complexity, and supporting risk management and regulatory compliance.

SLDS Committee

The SLDS Committee is the governance body of the SLDS. As outlined in North Dakota Century Code (15.1-02-18), the SLDS Committee *“shall set policy and adopt rules relating to access to and the collection, storage and sharing of information.”* The Committee may *“authorize studies to benefit and improve workforce training and education.”*

Century Code also designates the members of the SLDS Committee. The SLDS Committee can invite other subject matter experts as needed. The subject matter experts include members from those agencies or program areas that contribute data or receive information from the SLDS.

The SLDS Committee member or designee will have the authority to speak for and make obligations on behalf of the agency they represent. They should be familiar with the federal and state regulations that agency must comply with. They should also be familiar with the agencies programs and policies. This person should be able to answer the *“why”* questions concerning agency data.

The SLDS Committee will act on behalf of the state agency(s) that generates or provides the data. The SLDS will not provide data to other state agencies or external entities without consent of the originating agency(s). The SLDS Committee will also act as mediator between originating agencies and resolve conflicts.

State Longitudinal Data System

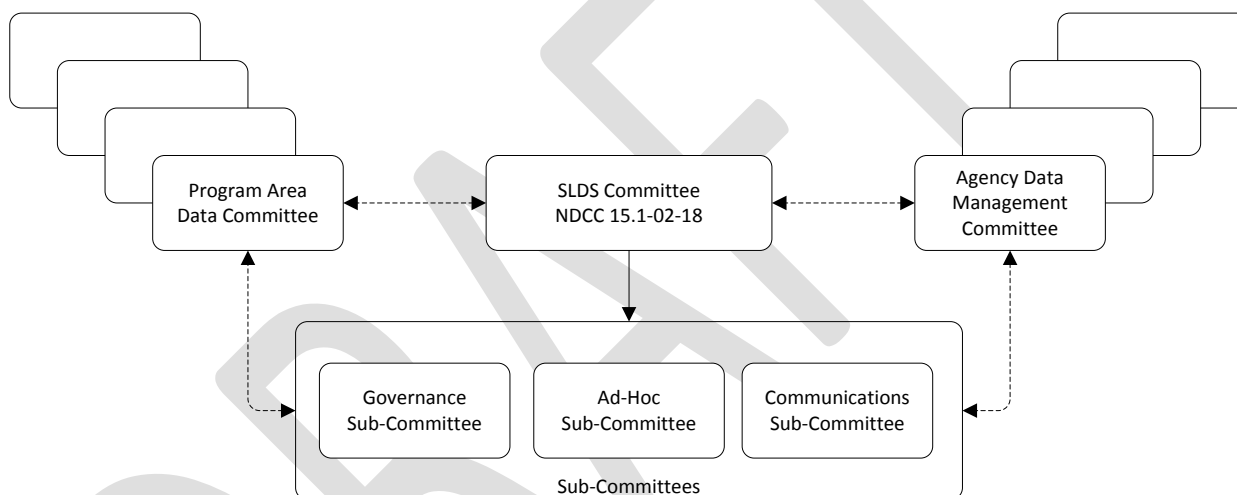
General Data Governance

The SLDS Committee will establish various subcommittees to focus on specific issues. These subcommittees may be standing committees (they have a continuing scope of work) or ad hoc (set up for a limited time or with a limited scope of work). Members of the subcommittees can include subject matter experts from agencies or program areas.

Program Area

In this context, a program area spans multiple agencies. An example of would be PK12 data which spans the Department of Public Instruction (DPI), the Department of Career and Technical Education (CTE), and the Education Standards and Practices Board (ESPB). Another example would be early childhood data which spans the Department of Human Services (DHS) and DPI.

It is recommended that these program areas establish governance procedures between member agencies.



Information Technology Department (ITD)

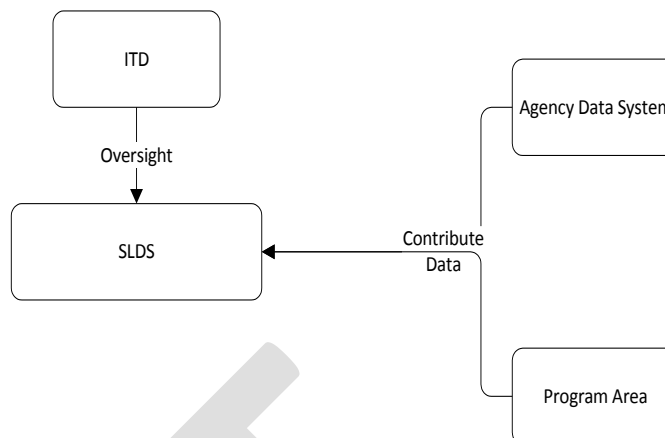
The SLDS is managed by the Information Technology Department (ITD) as outlined in North Dakota Century Code (15.1-02-18), ITD “shall maintain a statewide longitudinal data system among education, workforce, and training entities”.

ITD works in partnership with the agencies/entities contributing data to the SLDS to include the Department of Public Instruction (DPI), North Dakota University Systems (NDUS), Workforce and the school districts. ITD acts in accordance with federal laws, such as the federal Family Educational Rights and Privacy Act (FERPA) and the Individuals with Disabilities Education Act (IDEA, 34 CFR §§ 300.127 and 300.560-300.576), and ND statutes and regulations (e.g., Sections 15.1-02-08,09,10,13,18). All of these laws and policies are essential to maintaining the confidentiality of student records as they are collected and as they are maintained within The SLDS.

State Longitudinal Data System

General Data Governance

ITD is a neutral third party and works as an extension of the agency or program area providing data to the SLDS. This neutrality allows ITD to house various agency data in a single data system. ITD is able to receive identifiable data from multiple agencies and program areas, perform matching algorithms, and provide results to requesting agencies without compromising privacy.

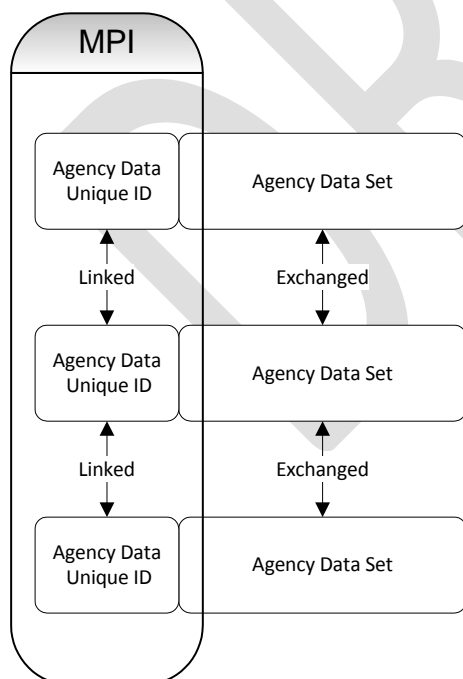


Agency Data Manager

The data manager is a generic term applied to the person within each agency or program area that is responsible for establishing, improving, monitoring, and training on the data management and data quality processes and programs for the agency or program area. This person should understand the agencies data systems (including data contained within the system) and act as the initial point of contact between ITD and the agency. This person should work closely with the agency representative on the SLDS Committee to ensure compatibility between policy (the “why”) and the mechanics of the agency data systems (the “how”).

Master Person Index

One of the key features of the longitudinal data system is to uniquely identify individuals. This unique identifier allows the linking of individual records across multiple data sets within an agency or program area.



Each agency or program area has (or should develop) a unique identifier for their area of responsibility. The SLDS attempts to link the multiple unique identifiers across data sets into a Master Person Index (MPI).

Each data set can contain different identifiable information depending on the purpose of the data collection. The linking occurs by attempting to match the common identifiable information contained in multiple data sets. This information can include first and last name, date of birth, and gender.

The MPI serves two purposes. First, it helps to validate the identifiable information contained in each data set. During the matching process, the system identifies near matches between data sets. An example of a near match would be if the first and last names match, but the birth date had the day and month transposed. This near match is sent back to originating source for verification and correction (if

needed). By identifying and correcting the data, both the SLDS and the originating agency benefit.

State Longitudinal Data System

General Data Governance

The second purpose is to provide a means for the agency or program areas to share data without the need to exchange identifiable information with each other. The exchange of identifiable information is between the originating agency and the SLDS. The SLDS performs the match and can facilitate the exchange of data sets without providing identifiable data to the receiving agency. This leads to better protection of private information and allows exchange of information while still complying with federal and state restrictions.

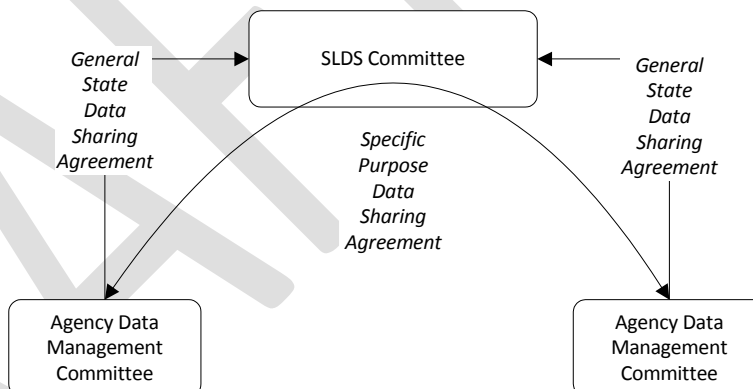
Data Sharing Agreements

Data Sharing Agreements fall into two broad categories, a General and a Specific Purpose Agreement.

General Inter-Agency Data Sharing Agreement – The general Inter-Agency Data Sharing Agreement is between the SLDS and the agencies or program areas supplying data to the SLDS. Each agency will submit an addendum to the agreement that outlines what general data will be sent to the SLDS and how that data will be protected.

The data will be loaded and linked to other data sets (via the MPI), but not shared outside the SLDS without consent by the providing agencies or program areas. Depending on the data to be shared, the consent can take the form of simple letter from the providing agency.

In other circumstances, a more formal Specific Purpose Data Sharing Agreement is needed.



Specific Purpose Data Sharing Agreement – The specific agreement is between the providing and requesting agencies or program areas. It will list the SLDS as the method for exchange. The agreement outlines the purpose of the agreement, what data will be exchanged, the period of the agreement, and how that data will be protected.

Conflict Resolution

As outlined in North Dakota Century Code (15.1-02-18.2), ITD (acting as oversight of the SLDS) may request from any state agency *“all information required by 20 U.S.C. 9871(e)(2)(D); and any other educational information the statewide longitudinal data system committee determines is required for a longitudinal data system to comply with state or federal law.”*

The representative(s) from the originating entity (the agency or program area providing the data) will provide specific reasons why the data cannot be exposed to the SLDS. These may include:

- Federal or State regulation preventing data from being exposed
- Data set not currently collected by the originating entity
- Data set not in a condition to be exposed (non-reliable or incomplete)

State Longitudinal Data System

General Data Governance

The SLDS Committee will work to alleviate/eliminate the reasons. These may include:

- Asking for Attorney General opinion
- Asking for federal agency interpretation
- Modifications to the request
- Requesting modifications to State regulations

The Department of Education established the Privacy Technical Assistance Center (<http://PTAC.ed.gov>) to assist states with data privacy concerns surrounding Longitudinal Data Systems. They can provide general guidance on data privacy issues based on interpretations of federal laws and regulations. PTAC also works closely with other federal agencies and can assist when data privacy issues goes beyond the K12 realm. They cannot provide guidance on interpretations of state or local laws and regulations.

DRAFT

State Longitudinal Data System

General Data Governance

Related Documents

Date	Document Title	Comments
14 Mar 2003	Data Request Outline	Draft format

DRAFT